

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOBIL CERRO NEGRO, LTD.))
))
))
Plaintiff,)	Civil Action No. _____
v.)	
PDVSA CERRO NEGRO S.A.)	NOTICE OF MOTION TO
)	ADMIT MICHAEL J. BARATZ
)	<u>PRO HAC VICE</u>
Defendant.)	
)	

PLEASE TAKE NOTICE that, upon the annexed affidavit of Michael Miller in support of this motion and the Certificates of Good Standing annexed thereto, plaintiff Mobil Cerro Negro, Ltd. (“Mobil CN”) will move this Court, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Michael J. Baratz, a member of the firm of STEPTOE & JOHNSON LLP, as attorney *pro hac vice* for Mobil CN in this matter.

Dated: New York, New York
December 27, 2007

STEPTOE & JOHNSON LLP

By: _____
Michael Miller (MM 4632)
750 Seventh Avenue, Suite 1900
New York, NY 10019
(212) 506-3900

Attorney for Plaintiff Mobil Cerro Negro, Ltd.